

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

IN RE:

DeAndrea L Green

Debtor(s)

Case No.: 16-06886

Chapter: 13

Plan filed on 04/22/2016

Confirmation Hearing: 7/11/16

Judge Deborah L. Thorne

OBJECTION TO CONFIRMATION OF PLAN FILED ON 04/22/2016

NOW COMES OCWEN LOAN SERVICING, LLC AS SERVICER FOR U.S. BANK NATIONAL ASSOCIATION, AS TRUSTEE FOR STRUCTURED ASSET INVESTMENT LOAN TRUST MORTGAGE PASS-THROUGH CERTIFICATES, SERIES 2005-7, and/or its assigns (hereinafter “Movant”), by and through its attorneys, Codilis & Associates, P.C., and moves this Honorable Court for an Order denying confirmation of Debtor’s plan filed on 04/22/2016 and in support thereof states as follows:

1. Debtor filed a petition under Chapter 13 of Title 11, United States Bankruptcy Code on 2/29/16 and this Court has jurisdiction pursuant to 28 U.S.C. §1334 and Internal Operating Procedure 15(a) of the United States District Court for the Northern District of Illinois;

2. Movant filed a claim secured by an interest in the real property commonly known as 311 S. 10th Avenue, Maywood, IL and that the Chapter 13 plan herein proposes that Debtor cure the pre-petition arrearage claim through the Chapter 13 Trustee while maintaining current, post-petition mortgage payments;

3. That although Movant has filed a proof of claim indicating a pre-petition arrearage in the amount of \$44,347.99, the proposed plan provides for payment of only \$23,871.44 in contradiction of Movant’s rights under 11 U.S.C. §1322(b)(2) and/or §1322(b)(5);

4. That sufficient grounds exist for denial of confirmation as Debtor’s plan:
- a. Fails to cure Movant’s pre-petition arrearage claim amount in full;

WHEREFORE, OCWEN LOAN SERVICING, LLC AS SERVICER FOR U.S. BANK NATIONAL ASSOCIATION, AS TRUSTEE FOR STRUCTURED ASSET INVESTMENT LOAN TRUST MORTGAGE PASS-THROUGH CERTIFICATES, SERIES 2005-7 prays this Court deny confirmation of the plan allowing the fees and costs described herein to be added to the indebtedness pursuant to the terms of the note and mortgage, and for such other and further relief as this Court may deem just and proper.

Dated this 7/1/2016

Respectfully Submitted,
Codilis & Associates, P.C.

By: /s/ Gloria Tsotsos

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NOTE: This law firm is a debt collector.